

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CALIFORNIA**

Complaint Filed: May 24, 2023

---

**DECLARATION OF VALERIE YANAROS**

---

I, Ms. Valerie Yanaros, Esq., do declare and state as follows: I am above eighteen (18) years of age and not a party to this action. I am counsel for Goode Enterprise Solutions (“GES”) and if called upon could and would competently testify to the following:

1. I received notice of this action towards the end of June 2023 from Mr. and Mrs. Goode, who contacted me after they received a copy of the complaint in this action filed against GES (the “Complaint”) and requested that I represent GES solely for purposes of settlement negotiations. I have represented Mr. and Mrs. Goode and/or their various companies for the past eight years.
2. I am an attorney licensed in the state of Texas but have been admitted to practice pro hac vice in Colorado and other states. I am not, however, licensed in California and am not otherwise authorized to practice before the U.S. District Court for the Northern District of California. I advised my client of this and of the need to retain local counsel to act as counsel of record. Only then could I subsequently file a motion to appear Pro Hac Vice if I were to continue to represent GES in the federal case pending in the Northern District of California.
3. After reviewing the Complaint, and pursuant to GES’s instructions, I reached out via email to the attorney of record for Plaintiff, Scott Burroughs, and attempted to settle the case.
4. While engaged in settlement discussions, I worked with Plaintiff’s counsel to secure multiple Stipulations with Proposed Orders for extensions of time for the parties to continue settlement discussions and for GES to find local counsel to file its Answer to the Complaint. (Dkts. 9, 19-20,24.) In these submissions, I indicated in the signature block that any representation in this matter was contingent on Defendant GES securing local counsel and, if authorized by GES, my subsequent “Appl[ication] to appear Pro Hac Vice in the Northern District of California.”

- 1           5. Since GES was never able to secure local counsel, I never filed a motion to appear *Pro*  
2           *Hac Vice*, as the local rules did not allow for it. However, I did act as a conduit for filings  
3           for extensions of time solely as authorized by GES for purposes of negotiating settlement  
4           discussions.
- 5           6. While we were engaged in settlement discussions, I worked with Mr. and Mrs. Goode to  
6           find local counsel for GES so it could file its response to Plaintiff's Complaint.
- 7           7. I spoke with various counsel that were admitted to practice in the Northern District of  
8           California and asked to hire them as local counsel in this action for GES.
- 9           8. During my conversations with potential local counsel, Mr. and Mrs. Goode's business and  
10          family encountered financial difficulties and hardships. Upon information and belief, they  
11          became delinquent on payments due not only on invoices for various legal matters that I  
12          handled, but also on other outstanding invoices. Their financial difficulties made it  
13          impossible for them to afford legal fees.
- 14          9. All efforts to procure local counsel for GES in this case were unsuccessful.
- 15          10. In addition, the parties were not able to reach a settlement.
- 16          11. I obtained consent from my client, GES, and from opposing counsel to file a "Motion to  
17          Withdraw." (Dkt. 26.) I captioned the filing as a "Motion to Withdraw" due to limitations  
18          in the Court's efilings system. This motion was intended to notify the Court that (1) GES  
19          intended to proceed *pro se* due to financial constraints that prevented its owners, Mr. and  
20          Mrs. Goode, from securing local counsel to represent GES before this Court, and, (2)  
21          consistent with GES's intent and instructions, I no longer intended to apply to appear *Pro*  
22          *Hac Vice*.
- 23          12. On the same date, November 24, 2023, I also sent an email to Plaintiff's counsel, Mr.  
24          Treschel, specifically providing him with Mr. and Mrs. Goode's email address to facilitate  
25          future communications and made myself available to the extent needed. Attached as  
26          Exhibit 1 is a true and correct copy of the email sent on November 4, 2023.
- 27          13. On that same day, Mr. Goode advised me that he attempted to file GES's Answer to the  
28          Complaint via *pro se* efilings but encountered a message that stated he was unable to efile

1 because I was still attorney of record. Mr. Goode also advised me that he filed GES's  
2 Answer via UPS mail on the date that GES' response was due, on November 24, 2023. He  
3 sent me pictures of the UPS folder, receipt, and the printed Answer. Attached as Exhibit  
4 2 are true and correct copies of the aforementioned pictures sent to me by Mr. Goode.

5 14. After the Court denied the "Motion to Withdraw," I continued to work with Mr. and Mrs.  
6 Goode to attempt to find local counsel that would represent GES so that GES's Answer  
7 could be efiled. These efforts were unsuccessful due to the client's financial  
8 circumstances. Despite non-payment for past services, I continued to work with Mr. and  
9 Mrs. Goode in light of the many years of representing them and their companies and this  
10 Court's January 1, 2024 Order. I understand that GES' main source of income has stopped  
11 payments and that it is insolvent.

12 15. Plaintiff's counsel provided no notice prior to filing its Motion for Leave to File a First  
13 Amended Complaint. Plaintiff's counsel also did not contact me to discuss the draft  
14 Amended Complaint.

15 16. The Court's docket improperly lists me as attorney of record for Defendant SBA  
16 Entertainment, LLC ("SBA") due to an inadvertent filing error at Dkt. 19. I have never  
17 represented this Defendant in any capacity and have made no submissions or made any  
18 representations to this Court or opposing counsel in this respect. As reflected in the actual  
19 text of the submission, the Stipulation with Proposed Order listed as Docket 19 was filed  
20 on behalf of Defendant GES and the Docket entry reflects an inadvertent filing error when  
21 clicking on the website.

22 I declare under penalty of perjury under the law of the State of California and the United  
23 States of America that the foregoing is true and correct.

24 Executed this May 10, 2024, in Dallas, Texas.

25  
26 Date: May 10, 2024.

27 Respectfully submitted,  
28 /s/ Valerie Yanaros.  
Valerie Yanaros

# EXHIBIT 1

**Neff v. SBA et al**

Me <valerie@yanaroslaw.com>

Fri, 24 Nov 2023 3:40:32 PM -0600 •

To "Frank Trechsel" <ftrechsel@donigerlawfirm.com>

Cc "Corey Goode" <goodetech@yahoo.com>, "sba.sgoode@gmail.com" <sba.sgoode@gmail.com>

---

Hi Frank,

I am looping you in with the owners of my client, Mr. and Mrs. Goode. I just filed my motion to withdraw, per our conversation, and they will proceed pro se.

Please let me know if I can help with anything. I hope you had a good Thanksgiving.

Val

Valerie Yanaros, Esq.  
Yanaros Law, P.C.  
8300 Douglas Avenue Suite 800  
Dallas, Texas 75225  
Telephone: (512) 826-7553

**\*Please note new address.**

**Confidentiality Notice:** The information contained in this email and any attachments may be privileged and confidential. Any dissemination, copying, or use of or reliance upon such information by or to anyone other than the intended recipient[s] is prohibited. If you have received this message in error, please notify the sender immediately at the email address above and destroy any and all copies of this message.

## EXHIBIT 2



**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CALIFORNIA**

Dustin Neff, an individual,

Plaintiff,

VS.

SBA Entertainment, LLC, a Colorado limited liability company; Goode Enterprise Solutions Inc., a Colorado corporation; and Does 1-10, inclusive,

Defendants.

Case No.: 3:23-cv-02518-JD

## DEFENDANT GOODE ENTERPRISE SOLUTIONS INC.'S ANSWER AND AFFIRMATIVE DEFENSES

Complaint Filed: May 24, 2023



SHIP TO: 1000-0000  
TO: 1000-0000  
450 GOLDEN GATE AVE

1 LBS  
DATE: 24 NOV 2003  
1 OF 1

SAN FRANCISCO CA 94102-3400



CA 941 9-31



UPS GROUND

TRACKING #: 1Z 0F3 Y34 03 0377 8943



BILLING: 9/9

9/9 9/9

100 10.000 220 450 45.00 10/0000



The UPS Store #2364  
6525 GUNPARK DR STE 370  
BOULDER, CO 80301-9333  
303-530-4888

Terminal.... POS23648  
Employee.... 286508

Date.: 11/24/2023  
Time.: 03:00 PM

ITEM NAME	QTY	PRICE	TOTAL
Ground Commercial			\$13.49
Tax	1	\$13.49	\$0.00
MM#BGTPC5COKD			
Tracking Number - 1Z0F3Y340363776943			\$0.49
Manilla Env Sm	1	\$0.49	\$0.04
Tax			\$0.04
Subtotal			\$13.98
Shipping/Other Charges			\$0.00
Total tax			\$0.04
Total			\$14.02
Cards			\$14.02

Items Designated NR are NOT eligible  
for Returns, Refunds or Exchanges.

US Postal Rates Are Subject to Surcharge.



View The UPS Store, Inc.'s privacy notice at  
<https://www.theupsstore.com/privacy-policy>

#### Win a \$250 gift card

Tell us how we're doing for your chance to win  
a \$250 gift card. Scan the QR code or visit  
the URL below to take the survey.



<https://bit.ly/theupsstorePRER>

NO PURCHASE NECESSARY. Void where prohibited.  
Ends 1/31/24. Must be US resident 18 years or older  
to enter. Limit (1) entry per person per month.

For Official Rules visit

[www.TheUPSStore.com/surveyrules2023](http://www.TheUPSStore.com/surveyrules2023)

#### Need Package Help?

(lost/damaged)

Provide details so we can help:

<https://online.ups.com/tccp>

VISA \*\*\*\*\*5469 052693

11/24/2023

03:00 PM

TID

773361440002

Purchase

VISA DEBIT

XXXXXXXXXXXX5469

ENTRY METHOD

CONTACTLESS CHIP

CVN

0320025653

Invoice

28650

Clerk

APPROVED

Response

052693

Auth Code

#### ENV DETAILS

MODE

ISSUER

AID

A0000000031010

TUR

0000000000

IAD

06061203A00000

Amount

USD \$14.02

NO SIGNATURE REQUIRED

CARDHOLDER/VISA

CARDHOLDER/VISA

\*\*\* CUSTOMER COPY \*\*\*